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10 Attorneys for Defendant
11 KEUN TAEK PARK

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 TOPPAN PHOTOMASKS, INC.,
16 Plaintiff,
17
18 vs.
19 KEUN TAEK PARK, an individual,
20 Defendant.
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Case No. 3:13-cv-3323 MMC

STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DISCOVERY

Complaint Filed: July 17, 2013
Trial Date: November 10, 2014
Judge: Hon. Maxine M. Chesney

STIPULATION

Plaintiff Toppan Photomasks, Inc. (TPI) and Defendant Keun Taek Park (collectively "the Parties"), participated in a settlement conference before Magistrate Judge Corley on March 7, 2014. The Parties have a subsequent settlement conference before Magistrate Judge Corley scheduled for April 28, 2014. In order to facilitate preparations for the April 28 settlement conference, the Parties stipulate and request that the following dates in the Pretrial Preparation Order (Dkt. No. 53) be modified as follows:

- Non-Expert Discovery Cutoff extended from April 14, 2014 to June 9, 2014;
- Designation of Experts extended from May 2, 2014 to June 9, 2014;
- Designation of Rebuttal Experts extended from May 30, 2014 to June 23, 2014; and
- Expert Discovery Cutoff extended from June 27, 2014 to July 7, 2014.

The Parties are not requesting that any other dates in the Pretrial Preparation Order be extended at this time.

The Parties further stipulate and request that (a) prior to the April 28, 2014 settlement conference, the Parties will serve no additional discovery on each other except that Mr. Park may serve written discovery on TPI regarding the May 3, 2013 email Mr. Park sent himself at CGI, and its attachment; and (b) that the Parties may nonetheless follow-up on incomplete discovery already served on each other. So stipulated.

DATED: March 14, 2014

THE BUSINESS LITIGATION GROUP, P.C.

By: /s/ Marc N. Bernstein

MARC N. BERNSTEIN

WILL B. FITTON

Attorneys for Defendant

KEUN TAEK PARK

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2 DATED: March 14, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

3
4 By: /s/ Danielle Ochs

5 DANIELLE OCHS
6 BECKI D. GRAHAM

7 Attorneys for Plaintiff
8 TOPPAN PHOTOMASKS, INC.

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10 **ATTESTATION OF CONCURRENCE IN FILING**

11 In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the
12 filing of this document has been obtained from Danielle Ochs.

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14 **ORDER**

15 IT IS SO ORDERED.

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17 Dated: March 17, 2014



18 Honorable Maxine M. Chesney
19 United States District Judge
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